

**Remarks**

**A. Pending Claims**

Claims 1-4, 6-8, 10, 12-15, 17-22, 24, 26-27, 29-34, 36, 38-62, and 71 are pending. Claims 1, 3, 4, and 48 have been amended.

**B. The Claims Are Not Obvious over Borghesi in View of Richards Pursuant To 35 U.S.C. § 103(a)**

The Examiner rejected claims 1, 2, 6-8, 12, 13, 17, 52-57, and 71 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,950,169 to Borghesi et al. (hereinafter “Borghesi”) in view of U.S. Patent No. 6,408,303 to Richards (hereinafter “Richards”). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner et al.*, 379 F.2d 1011, 154 USPQ 173, 177-178 (CCPA 1967). To establish a *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP § 2143.03. In addition, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Amended claim 1 describes a combination of features including: “automatically reading additional information from an administration system in response to receiving at least one incoming transaction from the at least one sending trading partner.” Claim 13 describes a combination of features including: “automatically read additional information from the administration system in response to receiving at least one incoming transaction from at least one sending trading partner.” Borghesi and Richards, alone or in combination, do not appear to teach

or suggest at least these features of claims 1 and 13, in combination with the other features of the claims.

The Office Action states:

Borghesi discloses a method for processing receiving trading partner transactions comprising: receiving at least one incoming transaction from at least one sending trading partner (column 16, lines 4-10; the home office sends a claim assignment to the body shop via the mailbox);

The Office Action apparently considers the “home office” disclosed in Borghesi as a sending trading partner and the “body shop” disclosed in Borghesi as a receiving trading partner. The Office Action asserts that Borghesi discloses “automatically reading additional information from an administration system in data communications with a computer system, wherein the additional information is read in response to receiving at least one incoming transaction from at least one sending trading partner.” Applicant respectfully disagrees with the Office Action’s assertion. Borghesi states:

As seen in FIG. 8F, when a user is creating a workfile for a specific claim the user begins by entering vehicle identification 220 into the workfile via the keyboard. After entering the vehicle identification data, the system automatically selects a database 222 from which to access parts lists and values for the particular vehicle. Within the database a search may be made by year, make and model of the vehicle 224 or the user may decide to have the vehicle identification number (VIN) decoded 226 in the database. The VIN number is a unique number assigned to each vehicle manufactured and also contains standard information that identifies the appropriate manufacturer make and model. Once the vehicle identification has been made and the appropriate parts database has been selected for that make model and year of the vehicle a user may select specific options available for that vehicle 228. After the proper identification and selection of options on the damaged vehicle have been made the user defines damage location 230 on the vehicle. The damage locations are defined using an illustration of a generic automobile on which number designations, corresponding to generally known areas of a car, may be selected by the user to identify the primary and secondary damage areas.

After creating or editing vehicle data, the user can go into the estimate tab of the workfile to create or edit an estimate. As shown in FIG. 8G, a user can either change estimate lines within the estimate 232, identify other charges such as towing or storage fees 234, or simply review the estimate totals for the car 236.

When a user is editing or adding information to the estimate, several databases are accessed automatically. Preferably, these databases are stored in a memory device such as a hard drive attached to the computer a user is using. In one preferred embodiment the user may access an original equipment manufacturer (OEM) part database 238, a recycled part/salvage part database 240, a labor cost database 242 and an aftermarket part database 244. Suitable commercially available databases for these four databases are the MOTOR database put out by Hearst Corporation, the recycled part valuation (RPV) database of salvage parts compiled by CCC Information Services, Inc., the recycle assembly crash estimating guide (RACEG) developed by Hearst Corp, containing labor rates, and an aftermarket parts database compiled by CCC Information Services, Inc. The user may also compare the total estimate to a threshold value 246.

(Borghesi, column 12, lines 14-58) (emphasis added).

Borghesi further states.

The home office sends a claim assignment to the mailbox of the DRP in the Communications server. The body shop accesses the assigned claim and sets up a work file as described above. Using the method described above, the body shop prepares a computerized estimate.

(Borghesi, column 16, lines 4-9) (emphasis added).

Borghesi appears to teach a user (e.g., a body shop employee) creating a workfile for a claim. Creating the workfile includes the user entering vehicle identification into the workfile via a keyboard. After the vehicle identification data is entered (e.g., by a body shop), the system selects a database from which to access parts lists and values for the particular vehicle. This list appears to be accessible by a user of the system to allow the user to manually enter information from the database to the workfile. Borghesi does not appear to teach or suggest automatically reading additional information from an administration system in response to receiving an incoming transaction from a sending trading partner.

Applicant submits that, for at least the reasons discussed above, claims 1 and 13 and the claims depending thereon are patentable over the cited art. Applicant therefore respectfully requests the removal of the 35 U.S.C. §103(a) rejections of these claims.

Moreover, Applicant submits that many of claims dependent on claims 1 and 13 are independently patentable. For example, claim 53 recites: “wherein at least one business rule

comprises an administration system identifier.” Claim 54 recites: “wherein at least one business rule comprises a transaction identifier.” Claim 55 recites: “wherein at least one business rule comprises a transaction status.” The cited art does not appear to teach or suggest at least these features of claims 53, 54, and 55, in combination with the other features of the claims.

Borghesi states:

Administrative information stored in the “ADMIN” tab includes several frames 108 of information accessible through the frame switching button bar 106 inside the tab. Preferably, the information comprises assignment information, inspection information, policy information, party information, statements, loss information, and repair site information. Assignment information includes items such as the claim number, the date the claim was reported, the date the claim was assigned, and information on who received the assigned claim, e.g., the names of the insurance company, appraiser and adjuster, as well as claim office location.  
(Borghesi, column 9, lines 18-29)

Applicant submits that the information in the ADMIN tab of Borghesi does not include an administration system identifier, a transaction identifier, or a transaction status. Borghesi does not appear to teach or suggest at least the above-quoted features of claims 53, 54, and 55. Applicant respectfully requests removal of the rejections of these claims.

**C. The Claims Are Not Obvious over Borghesi in View of Richards and Further in View of Hoover Pursuant To 35 U.S.C. § 103(a)**

The Examiner rejected claims 3, 4, 14, 15, 18-22, 24, 26, 27, 32-34, 38-51, and 58-62 under 35 U.S.C. 103(a) as being unpatentable over Borghesi in view of Richards and further in view of U.S. Patent No. 5,724,575 to Hoover et al. (hereinafter “Hoover”). Applicant respectfully disagrees with these rejections.

Claim 4 describes a combination of features including: “wherein at least one of the business rules comprises a string of at least one keyword and at least one operator, and wherein at least one of the business rules is entered into a computer system by a user via a user interface.” Independent claim 1, from which claim 4 depends, recites in part: “wherein the additional

information is identified by at least one business rule.” The cited art does not appear to teach or suggest at least the above-quoted feature of claim 4, in combination with the other features of the claim.

The Office Action states:

Borghesi does not disclose the at least one business rule comprises one or more logical operators and a string of at least one keyword and at least one operator, and wherein the business rule is entered into the computer system by a user via a user interface. However, Hoover teaches the features above (see figures 7-19 and columns 24-40).

The Office Action cites a lengthy portion of Hoover (“figures 7-19 and columns 24-40”) as the apparent basis for rejecting claim 4. The Office Action does not, however, state how Hoover teaches or suggests the features of claim 4. Hoover discloses:

An object-based relational distributed database system and associated methods of operation that transforms data stored in a plurality of remote, heterogeneous user databases into a homogeneous data model is disclosed. Data stored in distributed, heterogeneous user database structures is homogenized by mapping into object attributes of predetermined instances of objects forming to a conceptual model that relates the various heterogeneous databases. The object attributes are stored in remote databases at client sites, which can be separate computer systems from the heterogeneous user databases or separate processes running on a computer system that maintains the heterogeneous user databases.

(Hoover, abstract).

Hoover appears to teach a database system and methods that transform data stored in remote, heterogeneous user databases into a homogeneous data model. Neither the portions of Hoover cited by the Office Action nor other portions of Hoover appear to teach or suggest a business rule identifying additional information from an administration system, wherein the business rule comprises a string of at least one keyword and at least one operator, wherein at least one business rule is entered into a computer system by a user via a user interface. Applicant respectfully requests that the Examiner specifically point out the teachings in Hoover that the Examiner relies on to support the rejection of claim 4, or that the Examiner remove the rejection.

Moreover, Applicant respectfully submits that the Examiner has not stated a *prima facie* case of obviousness for combining Borghesi, Richards, and Hoover. The showing of a

suggestion, teaching, or motivation to combine prior teachings “must be clear and particular . . . . Broad conclusory statements regarding the teaching of multiple references, standing alone, are not ‘evidence’.” *In re Dembiczak*, 175 F.3d 994, 50 USPQ2d 1614 (Fed. Cir. 1999). The art must fairly teach or suggest to one to make the specific combination as claimed. Applicant submits that “for purpose of time consuming because it eliminates the need for the user to re-enter the data into the computer system” does not provide a motivation to combine Borghesi and Richards with the features disclosed in the cited portions of Hoover.

Claim 18 describes a combination of features including: “automatically generating at least one outgoing transaction in response to reading the additional information from the administration system, wherein at least one outgoing transaction comprises data from the incoming transaction and at least a portion of the additional information read from the administrative system.” The cited references, considered separately or in combination, do not appear to teach or suggest at least this features of claim 18, in combination with the other features of the claims.

The Office Action appears to rely on the teachings of Borghesi for the above-quoted feature of claim 18. Borghesi does not, however, appear to teach or suggest at least this feature of claim 18. Borghesi states:

Within the total loss valuation tab of the user interface a user can access entry fields to organize a valuation request. The steps a user takes in creating and viewing total loss calculations are shown in FIG. 8J. Within totals tab of the user interface, a user can create 268 a valuation request including all the pertinent information a third party database company needs to create the specific total loss valuation. After entering all the necessary data, a user then submits a valuation request 270 for completion. The valuation request is preferably transferred 272 to the outbox where it will be sent out over the system described above to be handled by a third party service provider. Total valuation results are received over the same communication network in the in box for the user and may be reviewed 274 by the user after accessing the in box and merging the data in the claimed datafile. The presently preferred method saves a user time by automatically transferring all files, whether from the out box or to the in box, when the user connects to the communications server via modem.

(Borghesi, column 13, lines 41-60) (emphasis added)

Borghesi appears to teach a user creating and submitting a valuation request. Borghesi does not appear to teach or suggest automatically generating at least one outgoing transaction in response to reading additional information from an administration system, wherein at least one outgoing transaction comprises data from the incoming transaction and at least a portion of the additional information read from the administrative system.

Claim 18 further describes: “generating a map, wherein generating the map comprises: selecting one or more source fields, wherein each source field corresponds to the source for the additional information; and selecting a destination field, wherein each destination field corresponds to at least one outgoing transaction; wherein the administration system from which additional information is read is specified by the map, wherein the map comprises a relationship between at least one outgoing transaction and a source for the additional information.” The cited references, whether considered separately or in combination, do not appear to teach or suggest at least these features of claim 18, in combination with the other features of the claim.

The Office Action states:

Borghesi does not teach generating the map comprises: selecting one or more source fields, wherein each source field corresponds to the outgoing transaction, wherein the administration system from which additional information is read is specified by a map, wherein the map comprises a relationship between the outgoing transaction and a source for the additional information and the map is specified by a user through a user interface. However, Hoover discloses the features above (see figures 7-19 and columns 24-40).

The Office Action cites a lengthy portion of Hoover (“figures 7-19 and columns 24-40”) as the apparent basis for rejecting claim 18. The Office Action does not, however, show how Hoover teaches or suggests the features of claim 18. Hoover discloses:

...each map table 120 in the object broker 20 comprises a linear table stored in the memory of the object broker computer, arranged as a plurality of rows of data items, each item arranged in columns of like types of data items. In the preferred embodiment, the data items include the object identifiers or indicia (also called object ID or OBJID), TABLE\_\_NAME, STATUS, and LOCATION. There is a record (a row) comprising a plurality of items associated with each object identifier for which data is stored anywhere in the system, globally. There can be a

plurality of entries for a given object identifier. There will be at least one entry for each instance of an object created in the system; for each instance of an object created by any of the remote databases, there will be at least one entry in the map table 120. Thus, the map table 120 is generally consulted, and is indexed, by object identifier and location.

(Hoover, column 24, lines 36-51)

The program operating in the object broker 20 is responsible for assembling a message for transmission over the communication link 22 to a selected remote database 28, depending on the LOCATION information that is determined as a result of first consulting one or more object index tables 130 to retrieve an object identifier, and second consulting the map table 120 to obtain a location where desired information is stored in one of the remote databases associated with the retrieved object identifier.

(Hoover, column 28, lines 34-43)

Hoover appears to teach a map table in an object broker comprising a linear table arranged as a plurality of rows of data items. The map table is consulted to obtain a location where desired information is stored in one of the remote databases associated with a retrieved object identifier. Neither the portions of Hoover cited by the Office Action nor other portions of Hoover appear to teach or suggest generating a map, wherein generating the map comprises selecting one or more source fields, wherein each source field corresponds to the source for the additional information; and selecting a destination field, wherein each destination field corresponds to at least one outgoing transaction, wherein the administration system from which additional information is read is specified by the map, wherein the map comprises a relationship between at least one outgoing transaction and a source for the additional information. Applicant respectfully requests that the Examiner specifically point out the teachings in Hoover that the Examiner relies on to support the rejection of claim 18, or that the Examiner remove the rejection.

In addition, Applicant respectfully submits that the Examiner has not stated a *prima facie* case of obviousness for combining Borghesi, Richards, and Hoover. Applicant submits that “for the purpose of time consuming because it eliminates the need for the user to re-enter the data into the computer system” does not provide a motivation to combine Borghesi and Richards with the features disclosed in the cited portions of Hoover.



Applicant submits that, for at least the reasons discussed above, claim 18 and the claims depending thereon are patentable over the cited art. Applicant therefore respectfully requests the removal of the 35 U.S.C. §103(a) rejections of these claims.

Moreover, Applicant submits that many of claims dependent on claims 18 are independently patentable. For example, claim 26 describes a combination of features including: “wherein a value of the destination field is a sum of respective values of the one or more selected source fields.” The cited art does not appear to teach or suggest at least this feature of claim 26, in combination with the other features of the claim.

Hoover states:

FIG. 13 illustrates the steps taken in the preferred embodiment to implement a more complex scenario involving a GET operation, bearing certain similarities to FIG. 12, except involving communications to more than one user computer 12. In this scenario, a `get__all__<class__name>` request message is formulated for objects of the class VISIT. In other words, the scenario in this figure contemplates the retrieval of information related to a plurality of instances of VISIT objects, for example, all the visits associated with a particular person's object identifier.  
(Hoover, column 32, lines 31-40)

Hoover appears to teach retrieval of information related to a plurality of instances of a class of objects. Hoover does not appear to teach or suggest wherein a value of a destination field is a sum of respective values of the one or more selected source fields.

Claim 40 describes a combination of features including: “wherein at least one outgoing transaction is an annuity asset pricing transaction.” Claim 41 describes a combination of features including: “wherein at least one outgoing transaction is a positions and valuation focused refresh transaction.” Claim 42 describes a combination of features including: “wherein at least one outgoing transaction is a positions and valuation full refresh transaction.” Claim 43 describes a combination of features including: “wherein at least one outgoing transaction is an insurance pricing transaction.” Claim 44 describes a combination of features including: “wherein at least one outgoing transaction is a commission settlement transaction.”

The Examiner states:

Regarding claims 39-44, Borghesi further the outgoing transaction is an insurance-related transaction, an annuity asset pricing transaction, a positions and valuation focused refresh transaction, an insurance pricing transaction, a commission settlement transaction (column 4, lines 25-30, column 13, lines 45-53, column 10, lines 25-28, and column 16, lines 12-15).

Applicant respectfully disagrees with the Examiner's assertions. Borghesi states:

Within totals tab of the user interface, a user can create 268 a valuation request including all the pertinent information a third party database company needs to create the specific total loss valuation.  
(Borghesi, column 13, lines 45-48)

At this point, the user may send out a request for a specific total loss valuation from a third party provider that will calculate the specific value of the car.  
(Borghesi, column 10, lines 25-27)

The body shop then creates 404 a computer Estimate-Of-Record (EOR) and e-mails via the out box, as part of a work file, the EOR and electronic images to the insurance company.  
(Borghesi, column 16, lines 12-15)

Borghesi appears to teach creating total loss valuations and Estimates-Of-Record. Borghesi does not appear to teach or suggest to an outgoing transaction that is an annuity asset pricing transaction, a positions and valuation focused refresh transaction, a valuation full refresh transaction, an insurance pricing transaction, or a commission settlement transaction. Applicant respectfully requests removal of the rejections of claims 40-44.

Claim 47 describes a combination of features including: "automatically generating at least one outgoing transaction in response to reading additional information from the administration system, wherein at least one outgoing transaction comprises data from the incoming transaction and the additional information read from the administrative system." For reasons similar to those set forth above with respect to claim 18, Applicant submits that the cited references, considered separately or in combination, do not appear to teach or suggest at least these features of claim 47,

in combination with the other features of the claim.

Claim 47 further describes:

generating a map, wherein generating the map comprises:  
    selecting one or more source fields, wherein each source field corresponds to the source for the additional information; and  
    selecting a destination field, wherein each destination field corresponds to at least one outgoing transaction, wherein selecting a destination field comprises:  
        determining whether to apply a source side function to one or more source fields in the source fields selection;  
        if no function is applied, a value of a destination field is approximately equal to a sum of values of the selected source fields;  
        if a function is applied, a value of a destination field is approximately equal to a sum of values of one or more source fields in which a source side function has been applied;  
    wherein the administration system from which additional information is read is specified by the map, wherein the map comprises a relationship between at least one outgoing transaction and a source for the additional information;

The cited art does not appear to teach or suggest at least the above-quoted features of claim 47, in combination with the other features of the claim.

Applicant submits that, for at least the reasons discussed above, claim 47 and the claims depending thereon are patentable over the cited art. Applicant therefore respectfully requests the removal of the 35 U.S.C. §103(a) rejections of these claims.

The Office Action states: "Claims 47-51, 58-62 have similar limitations found in claims 18, 26, 27, 22, 24, 38, 52-56, discussed above, therefore are rejected by the same rationale." Applicant notes that each of claims 18, 26, 27, 22, 24, 38, 47-51, 52-56, and 58-62 is directed to a distinct combination of features. Applicant specifically notes that the features of independent claim 47 are distinct from those of independent claim 18. Applicant respectfully requests that the Examiner consider each of the features of these claims.

**D. The Claims Are Not Obvious over Borghesi in View of Richards and Further in View of Hoover and Further in View of Wamsley Pursuant To 35 U.S.C. § 103(a)**

The Examiner rejected claims 29-31 under 35 U.S.C. 103(a) as being unpatentable over Borghesi in view of Richards and Hoover and further in view of U.S. Patent No. 5,956,687 to Wamsley et al. (hereinafter "Wamsley"). Applicant respectfully disagrees with these rejections.

Claim 29 describes a combination of features including: "wherein the schedule comprises a predetermined time for receiving at least one incoming transaction from the at least one sending trading partner." Claim 30 describes a combination of features including: "wherein the schedule comprises a predetermined time for reading the additional information from the administration system." Claim 31 describes a combination of features including: "wherein the schedule comprises a predetermined time for sending at least one outgoing transaction to the at least one receiving trading partner." The cited art does not appear to teach or suggest at least the above-quoted features of claims 29, 30, and 31, in combination with the other features of the claims.

Wamsley states:

...the program prompting generation of a first number of documents in accordance with a first schedule timed by the program for each of the records...  
(Wamsley, column 32, lines 55-58)

...the program prompting generation of a second number of documents different from the first documents different from the first documents in accordance with a second schedule initiated by said changing and timed by the program...  
(Wamsley, column 32, line 64 through column 33, line 1)

...the program prompting generation of a third number of documents in accordance with a third schedule timed by the program...  
(Wamsley, column 33, lines 10-12)

Wamsley appears to teach a program prompting generation of documents in accordance with a schedule timed by the program. Wamsley does not appear to teach or suggest a schedule comprising a predetermined time for receiving at least one incoming transaction from a sending

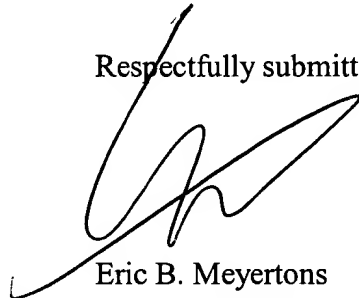
trading partner, for reading additional information from an administration system, or for sending at least one outgoing transaction to a receiving trading partner. Applicant respectfully requests the Examiner to withdraw the rejections of claims 29-31.

**E. Additional Remarks**

Based on the above, Applicant submits that all claims are in condition for allowance. Favorable reconsideration is respectfully requested.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are required, please charge those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-23300/EBM.

Respectfully submitted,



Eric B. Meyertons  
Reg. No. 34,876

Attorney for Applicant

MEYERTONS, HOOD, KIVLIN, KOWERT & GOETZEL, P.C.  
P.O. BOX 398  
AUSTIN, TX 78767-0398  
(512) 853-8800 (voice)  
(512) 853-8801 (facsimile)

Date: October 27, 2004